



WYOMING GAME AND FISH DEPARTMENT

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March 4, 2024

WER 11124.01

U.S. Fish and Wildlife Service

National Wildlife Refuge System;

Biological Integrity, Diversity, and Environmental Health proposed rule change

FWS-HQ-NWRS-2022-0106

U.S. Fish and Wildlife Service

5275 Leesburg Pike

MS: PRB (JAO/3W)

Falls Church, VA 22041-3803

<https://www.regulations.gov>

Dear Madam/Sir,

The Wyoming Game and Fish Department (Department) has reviewed the proposed National Wildlife Refuge System, Biological Integrity, Diversity, and Environmental Health (BIDEH) proposed regulations change. The Department is statutorily charged with managing and protecting all Wyoming wildlife (W.S. 23-1-103). Pursuant to our mission, we offer the following comments for your consideration.

The U.S. Fish and Wildlife Service (Service), propose new regulations to ensure that the BIDEH of the National Wildlife Refuge System (Refuge System) are maintained, and where appropriate, restored and enhanced, in accordance with the National Wildlife Refuge System Improvement Act of 1997. These proposed regulatory and policy revisions would support conservation throughout the Refuge System in response to both longstanding and contemporary conservation challenges, including the universal and profound effects of climate change on refuge species and ecosystems.

The Department encourages the Service to continue to work directly with the states, as well as with their regional associations, in an effort to enhance these proposed changes with language which recognizes the expertise and authority of the individual state fish and wildlife management agencies. There are several proposed changes which could substantially benefit from inclusion of direction for the Service to consult and collaborate with the affected state(s) in matters for which the states can provide a high level of expertise in addressing species or ecosystem specific issues. Areas within the regulations where inclusion of such language would be extremely meaningful include:

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PART 29 - LAND USE MANAGEMENT

§ 29.3 Biological integrity, diversity, and environmental health.

- (c) Management directives for ensuring BIDEH.
 - (2) Conserve and connect habitat
 - (3) Manage fish and wildlife populations
- (d) Management activities and uses with potential to ensure BIDEH.
 - (1) Native predator control
 - (2) Conservation translocations
 - (4) Invasive species management
 - (6) Agricultural uses

The above listed regulation sections are also proposed to be extremely restrictive in the potential management options which can be considered for the refuge system. This direction, in conjunction with no consultation with the respective state fish and wildlife agencies, will only exacerbate the Service's limited opportunity to develop successful management options to address BIDEH within the refuge system.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Will Schultz, Habitat Protection Supervisor, at 307-777-4587.

Sincerely,



Angi Bruce
Deputy Director

AB/ws

cc: Chris Wichmann, Wyoming Department of Agriculture